

THOMAS AMBROSIO

Member of NJ & NY Bars

April 4, 2024

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15 due 4/16.

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Via ECF Honorable Denise L. Cote, U.S.D.J. Southern District of New York 500 Pearl Street New York, NY 10007

RE:

United States v. Stephany Koury

23-cr-421 (DLC)

Dear Judge Cote:

Stephany Koury is scheduled to be sentenced on April 19, 2024. Her sentencing submission is due tomorrow, April 5, 2024, however, the Final Presentence Report has not yet been filed. Additionally, yesterday, April 3, 2024, I concluded a month-long trial in the District of New Jersey, U.S. v. Healy, 18-cr-703. My work on that trial made me unavailable to work on other cases for six weeks.

I have been in contact with U.S. Probation and was advised that they anticipate filing the Final Presentence Report on April 5, 2024.

Based upon the foregoing, I respectfully request that I be permitted to file Ms. Koury's sentencing submission on Thursday, April 11, 2024. I have Spoken to AUSA Patrick Moroney about this request and on behalf of the Government he does not object. He further represented that the Government would be prepared to file its sentencing submission on Friday, April 12, 2024.

Your Honor's granting of this filing extension request would be greatly appreciated.

Respectfully yours,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: Stephany Koury (via email)